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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

REARDEN LLC, REARDEN MOVA LLC,

Case No. 4:17-cv-04006-JST

Plaintiffs,

V.

DISNEY ENTERPRISES, INC., a Delaware corporation, DISNEY STUDIO PRODUCTION SERVICES CO., LLC f/k/a WALT DISNEY PICTURES PRODUCTION, LLC, a California limited liability company, WALT DISNEY PICTURES, a California corporation, MARVEL STUDIOS, LLC a Delaware limited liability company, MVL PRODUCTIONS LLC, a Delaware limited liability company, CHIP PICTURES, INC., a California corporation, INFINITY PRODUCTIONS LLC, a Delaware limited liability company, ASSEMBLED PRODUCTIONS II LLC, a Delaware limited liability company,

Defendants.

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
DEFENDANTS' MATERIAL SHOULD
BE SEALED REGARDING
PLAINTIFFS' OPPOSITIONS TO
MOTION FOR SUMMARY
JUDGMENT AND *DAUBERT*
MOTIONS**

Courtroom: 6 – 2nd Floor
Judge: Honorable Jon S. Tigar

1 **PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER DEFENDANTS'**
 2 **MATERIAL SHOULD BE SEALED**

3 Pursuant to Civil L.R. 79-5(d) and (e), Plaintiffs Rearden LLC and Rearden Mova LLC
 4 ("Rearden") (collectively, "Plaintiffs") hereby file this Administrative Motion to Consider Whether
 5 Defendants' Material Should be Sealed regarding Plaintiffs' Oppositions to Motion for Summary
 6 Judgment and *Daubert* Motions (the "Motion").

7 The documents that are listed below are designated confidential (including Attorneys' Eyes
 8 Only) by Defendants subject to the Protective Order in the above-captioned case. Rearden takes no
 9 position on the propriety of the confidentiality designations for purposes of this motion, but rather
 10 leaves it to Defendants to defend their designations in their response.

11 Rearden's counsel have reviewed and complied with this Court's Standing Order Governing
 12 Administrative Motions to File Materials Under Seal and Civil L.R. 79-5(d) and (e). Rearden's
 13 request is narrowly tailored and requests sealing only portions of the record that correspond to
 14 materials that defendants have described as sealable material. Civil L.R. 79-5(b).

Document	Basis for Redaction / Filing Under Seal
Opposition to Motion for Summary Judgment	
Exhibit 1 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Exhibit 2 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
Exhibit 3 to the Declaration of Mark Carlson	Defendants designated documents referenced in this brief as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Exhibit 4 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only and Confidential under the stipulated protective order, Dkt. 114.
Exhibit 5 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.

1	Exhibit 6 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
2	Exhibit 7 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
3	Exhibit 15 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
4	Exhibit 20 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
5	Exhibit 22 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
6	Exhibit 23 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
7	Exhibit 24 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
8	Exhibit 25 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
9	Exhibit 26 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
10	Exhibit 27 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
11	Exhibit 28 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
12	Exhibit 29 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
13	Exhibit 30 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
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1	Exhibit E to the Declaration of Stephen Perlman in Support of Opposition to Defendants' Motion for Summary Judgment	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
Opposition to Motion to Exclude Philip Fier		
4	Opposition to Motion to Exclude Philip Fier	Defendants designated documents referenced in this brief as Attorney's Eyes Only and Confidential under the stipulated protective order, Dkt. 114.
5	Exhibit A to the Declaration of Jerrod Patterson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
6	Exhibit B to the Declaration of Jerrod Patterson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
7	Exhibit F to the Declaration of Jerrod Patterson	Defendants designated information referenced in this brief as Confidential under the stipulated protective order, Dkt. 114.
Opposition to Motion to Exclude Cindy Ievers		
11	Exhibit C to the Declaration of Jerrod Patterson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Opposition to Motion to Exclude Alberto Menache		
17	Opposition to Motion to Exclude Alberto Menache	Defendants designated documents referenced in this brief as Attorney's Eyes Only and Confidential under the stipulated protective order, Dkt. 114.
19	Exhibit A to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
21	Exhibit C to the Declaration of Mark Carlson	Defendants designated information referenced in this brief as Confidential under the stipulated protective order, Dkt. 114.

25 DATED: August 3, 2023

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26 By: /s/ Jerrod Patterson
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